

1 Karen L. Handorf (admitted *Pro Hac Vice*)
2 Michelle C. Yau (admitted *Pro Hac Vice*)
3 Mary J. Bortscheller (admitted *Pro Hac Vice*)
4 Daniel Sutter (admitted *Pro Hac Vice*)
5 COHEN MILSTEIN SELLERS & TOLL PLLC
6 1100 New York Ave. NW • Fifth Floor
Washington, DC 20005
Telephone: (202) 408-4600
Fax: (202) 408-4699

Todd Jackson (Cal. Bar No. 202598)
Nina Wasow (Cal. Bar No. 242047)
FEINBERG, JACKSON, WORTHMAN &
WASOW, LLP
2030 Addison St. • Suite 500
Berkeley, CA 94704
Telephone: (510) 269-7998
Fax: (510) 269-7994

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

Charles Baird and Lauren Slayton, as
individuals, and on behalf of all others
similarly situated, and on behalf of the
BlackRock Retirement Savings Plan,

Plaintiffs,

v.

BlackRock Institutional Trust Company,
N.A., et al.,

Defendants.

Case No: 4:17-cv-01892-HSG

**DECLARATION OF DANIEL R. SUTTER IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

I, Daniel R. Sutter, declare as follows:

1. I am an attorney at Cohen Milstein Sellers & Toll, PLLC. I am counsel for Plaintiffs in the above-referenced matter. I submit this declaration pursuant to N.D. Cal. Civil Local Rules 79-5(e) to show good cause in support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the Parties' Joint Discovery Letter Relating to the Testimony of Jason Strofs, as the Rule 30(b)(6) Corporate Representative for BlackRock, Inc. ("Joint Letter") and corresponding portions of the Joint Letter.

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2. I have personal knowledge of all facts stated in this declaration, and if called to
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testify, I would testify competently thereto.
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3. Between October 20, 2017 and the present, Defendants produced, among other
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documents, materials that Plaintiffs reference or identify in the Joint Letter.
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4. Defendants designated every page of these materials “Confidential,” under the terms
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of the Protective Order entered by this Court on October 18, 2017 (ECF No. 76).
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5. On October 23, 2018, Defendants designated transcript pages from the deposition of
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Jason Strofs, taken September 19, 2018, as “Confidential” under the terms of the Protective Order
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entered by this Court on October 18, 2017 (ECF No. 76).
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6. The designated portions of the Joint Letter and exhibits thereto identify and/or
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reference the materials that Defendants designated “Confidential.”
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I declare under penalty of perjury under the laws of the United States that the foregoing is
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true and correct and that this declaration was executed on December 2, 2018.
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/s/ Daniel R. Sutter
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COHEN MILSTEIN SELLERS & TOLL, PLLC
1100 New York Avenue, N.W.
20
Suite 500, West Tower
21
Washington, D.C. 20005
22
Tel: (202) 408-4600
Fax: (202) 408-4699
dsutter@cohenmilstein.com
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26
27
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